

## CALFRESH (CF) PROGRAM REQUEST FOR POLICY/REGULATION INTERPRETATION

**INSTRUCTIONS:** Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 7/21/2017	NEED RESPONSE BY: 7/31/2017
2. REQUESTOR NAME:  3. PHONE NO.:  4. REGULATION CITE(S):	6. COUNTY/ORGANIZATION: El Dorado County	
	7. SUBJECT: Gift Cards as Income	
	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) <b>NOTE: All requests must have a regulation cite(s) and/or a reference(s).</b> ACIN I-82-01 (bottom of p. 6)	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):  
 We currently have a CalFresh case where the client's mother (who is not in the household) gives the client a \$500 Target Gift Card each month to be used for food, personal, or household items client may want or need. While some regulations tend to lean toward gift cards not being countable as income in a CF case, stores such as Target have since changed to be all-inclusive, AND there are options available to cash out gift cards (cardcash.com and cardpool.com will buy gift cards, giving options to receive a check or PayPal payment which can be transferred to one's bank account; CoinStar Exchange kiosks will give up to 85% of the gift card value in cash).

10. REQUESTOR'S PROPOSED ANSWER:  
 In this instance, because the gift card is recurring and is for an all-inclusive store (as opposed to a product specific store, such as a clothing store), and because the gift card can be redeemed for cash, the card is essentially a cash equivalent contribution and should be used as unearned income in the CalFresh case.

### 11. STATE POLICY RESPONSE (CFPB USE ONLY):

Based on the information provided in this scenario, the gift card would not be considered income, in accordance with the administrative notice that FNS recently issued in 2017.

### FOR CDSS USE

DATE RECEIVED: July 25, 2017	DATE RESPONDED TO COUNTY/ALJ: July 26, 2017
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